



SDMS DocID

2232379

ORIGINAL

LORID

*Received 11-25-03
by V. Janosik, RPM*

Mr. Victor Janosik, RPM (3HS22)
Western PA Section
United States Environmental Protection Agency, Region 3
1650 Arch Street
Philadelphia, PA 19103-2029

Via UPS Next Day Air

November 20, 2003

Reference: Lord-Shope VOC-TOC Correlation

Dear Mr. Janosik:

As requested, this letter provides an explanation of the above reference. In two of every three of our RA monthly progress reports, Lord reports actual Total Organic Carbon (TOC) data from the Lord-Shope Landfill effluent. This TOC value is then used to predict a Volatile Organic Carbon (VOC) in the effluent of the Lord-Shope Landfill.

History of the VOC-TOC Correlation at Lord-Shope

The Pennsylvania Department of Environmental Protection (PADEP) reduced the required effluent monitoring that Lord Corporation performs for the NPDES like permit in a routine five year review after Lord Corporation had collected VOC, TOC and numerous other parameters in the effluent of Lord-Shope Landfill for over 5 years. PADEP reduced the VOC effluent monitoring requirement from monthly to quarterly. In order to help justify this reduced monitoring, Lord Corporation submitted the attached semi-log graph to PADEP to demonstrate how effluent performance had improved over time and how well effluent VOC and TOC correlate. Each point on this graph is the average of 12 monthly monitoring results. Lord Corporation uses TOC results for the sole purpose to demonstrate control of VOC in the effluent in the months without VOC testing. Chemical Oxygen Demand (COD) effluent results were also reviewed to determine correlation with VOC results but showed no correlation.

Sincerely,

LORD CORPORATION

Robert E. Nipper

Robert E. Nipper
Staff Environmental Engineer

Attachment – Shope Data Correlation

REN03030/cmf

Shope Data Correlation

